

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
MANHATTAN DIVISION**

PACIFIC ALLIANCE ASIA
OPPORTUNITY FUND L.P.,

Plaintiff,

v.

KWOK HO WAN, a/k/a KWOK HO, a/k/a
GWO WEN GUI, a/k/a GUO WENGUI, a/k/a
GUO WEN GUI, a/k/a WAN GUE
HAOYUN, a/k/a MILES KWOK, a/k/a
HAOYUN GUO, GENEVER HOLDINGS
CORPORATION, and GENEVER
HOLDINGS LLC,

Defendants.

Adversary Proceeding No. 22-01073-dsj

**PACIFIC ALLIANCE ASIA OPPORTUNITY FUND L.P.’S MOTION TO REMAND OR,
IN THE ALTERNATIVE, FOR ABSTENTION PURSUANT TO 28 U.S.C. § 1334(C)(1)**

Plaintiff Pacific Alliance Asia Opportunity Fund L.P. (“PAX”) hereby moves to remand the above-captioned action to the Supreme Court of the State of New York – County of New York: Commercial Division (Justice Ostrager presiding), or alternatively, for an order abstaining from determining this action pursuant to 28 U.S.C. § 1334(c)(1). The grounds for Plaintiff’s motion are fully set forth in Plaintiff’s accompanying Memorandum of Law and the supporting Declaration of Peter Friedman, each of which is being filed contemporaneously herewith.

Dated: April 13, 2022
New York, New York

/s/ Peter Friedman
Peter Friedman (admitted *pro hac vice*)
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